

EILEEN GRADY,

Plaintiff,

v.

WAREHAM POLICE DEPARTMENT,
TOWN OF WAREHAM,
THOMAS JOYCE, and
MICHAEL J. HARTMAN

Defendants.

EILEEN GRADY,

Plaintiff,

v.

WAREHAM POLICE DEPARTMENT,
TOWN OF WAREHAM,
THOMAS JOYCE, and
MICHAEL J. HARTMAN

Defendants.

EILEEN GRADY,

Plaintiff,

v.

WAREHAM POLICE DEPARTMENT,
TOWN OF WAREHAM,
THOMAS JOYCE, and
MICHAEL J. HARTMAN

Defendants.

EILEEN GRADY,

Plaintiff,

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TOWN OF WAREHAM,
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EILEEN GRADY,

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Defendants.

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WAREHAM POLICE DEPARTMENT,
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Defendants.

6. The parties will be unfairly prejudiced if they are not given adequate time to prosecute and defend the claims in this action and to complete the pending discovery.

7. On the other hand, no prejudice will inure to the parties from the allowance of this Motion.

8. The parties believe that enlarging time to complete discovery will be in their interests as well as the interest of justice.

WHEREFORE, in order to have sufficient time to complete discovery, the parties jointly request that the Scheduling Order be amended in this case by: (1) extending the discovery deadline to May 19, 2006; and (2) rescheduling the pretrial conference to June 1, 2006, or as soon thereafter as the Court's calendar permits.

Respectfully submitted,

Plaintiff, Eileen Grady,
By her attorneys,

Defendants Wareham Police Department, Town
Of Wareham, Thomas Joyce, and Michael J.
Hartman,
By their attorneys,

/s/ Barbara A. Robb
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Dated: February 22, 2006

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